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Attorney for Defendant
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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

JOYCE HERNANDEZ, an individual,

Plaintiff,

v.

WALMART, INC., a Delaware
corporation; and DOES 1-50, inclusive,

Defendants.

Case No. 1:23-cv-01355-KES-SKO

**STIPULATION AND ORDER TO
EXTEND EXPERT DISCOVERY
DEADLINES**

(Doc. 36)

Complaint Filed: June 20, 2023
Removal Date: September 13, 2023
Trial Date: March 10, 2026

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12 JOYCE HERNANDEZ

TO THE COURT:

COMES NOW Plaintiff Joyce Hernandez and Defendant Walmart Inc., (collectively the “Parties”), by and through their counsel of record, and stipulate as follows:

WHEREAS, expert discovery is underway;

WHEREAS, the current rebuttal expert disclosure date is August 15, 2025, and the expert discovery cutoff date is August 29, 2025;

WHEREAS, Defendant’s rebuttal expert is unavailable between August 15 and 25, 2025, and has advised that she will need additional time to complete the required report;

WHEREAS, both Parties will also need additional time to complete expert depositions due to experts’ availability;

WHEREAS, the Parties would like to extend the current deadlines for rebuttal expert disclosures and expert discovery;

WHEREAS, the trial date in this matter is not until March 10, 2026;

NOW, THEREFORE, to allow for the completion of expert discovery, the Parties stipulate to, and respectfully request, a modification of the expert discovery deadlines, as follows:

1. An extension of the current rebuttal expert disclosure deadline of August 15, 2025 to August 29, 2025.
2. An extension of the current expert discovery cut-off date of August 29, 2025 to September 12, 2025.

IT IS SO STIPULATED.

1 Dated: August 14, 2025

**OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, LLP**

2
3 By: Eireann Brooks
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5 Brittney L. Turner
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7 *Attorney for Defendant*
8 WALMART, INC.

9 Dated: August 14, 2025

BROCK & GONZALES, LLP

10 By: /s/ Douglas B. Hayes
11 Douglas B. Hayes
12 Kendall Weaver
13 *Attorneys for Plaintiff*
14 JOYCE HERNANDEZ
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ORDER

Having considered the foregoing Stipulation of the Parties (Doc. 36), and good cause appearing (Fed. R. Civ. P. 16(b)(4), the Court hereby orders as follows:

The current Scheduling Order (Doc. 24) is hereby modified as follows:

1. The rebuttal expert disclosure deadline is continued to **August 29, 2025**; and
2. The expert discovery deadline is continued to **September 12, 2025**.

All other deadlines in the case schedule (Doc. 33) remain unchanged.

IT IS SO ORDERED.

Dated: **August 15, 2025**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE